

June 27, 2005

Comment 147

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn: Notice Number 41  
P.O. Box 14412  
Washington, DC 20044-4412

## **Re: Labeling and Advertising of Wines, Distilled Spirits and Malt Beverages**

On behalf of Community Anti-Drug Coalitions of America (CADCA) and over 5,000 community coalition members throughout the nation, I am writing to provide suggestions for the creation of mandatory, universal and comprehensive labeling of all alcohol products. Community anti-drug coalitions are broad-based groups, consisting of multiple community sectors that use their collective energy, experience and influence to address the drug and alcohol problem in their neighborhoods, cities, counties and states. These coalitions develop strategies for addressing every aspect of their substance abuse problem – prevention, intervention, treatment, aftercare and law enforcement, but with a particular focus on prevention.

Community coalitions recognize the risks of underage drinking and negative consequences of excessive drinking among all age groups and encourage adults to drink only in moderation. In order for citizens to practice moderation, alcoholic beverages must be labeled with the percentage of alcohol content and the number of alcohol servings per container. Alcohol manufacturers must fully disclose the contents of their products, explicitly stating the number of alcohol servings contained. The clear labeling of all alcohol products will enable the public to practice moderation when consuming alcoholic beverages.

CADCA supports the labeling requirements developed by the Center for Science in the Public Interest and the National Consumer's League. Their principles for the effective labeling of alcoholic beverages are:

- 1. Labeling rules concerning important consumer information must be mandatory, rather than voluntary.** Voluntary labeling would serve the interests of producers, rather than consumers, and could lead to more confusion about alcoholic-beverage choices.
- 2. Information labeling rules for alcoholic beverages must be universal and consistent, and apply to all alcoholic beverages.** Today's rules, which provide for different labeling of various types of alcoholic beverages make no sense.
- 3. Some proposed label information is more important and meaningful than other proposals.** Information about calories, alcohol content, serving size, and ingredients, for example, would assist consumer choices and help drinkers regulate their alcohol consumption. "Nutrition" labeling of protein and fats would generally provide irrelevant and useless information.

**4. Alcoholic-beverage labeling must be clear, comprehensive, and utilitarian.** Experience with food labels suggests that consumers look for key information about the foods they eat. The nutrition panel has been an effective means of informing consumer choices and "alcohol facts" labeling could be equally helpful.

**5. Allergen labeling should follow FDA requirements.** Producers should disclose the presence of any major allergen intentionally added to an alcoholic beverage, subject to the limited exemptions permitted in FDA law.

**6. The consumer benefits of labeling can be significant and the cost of requiring informational panels is trivial.**

**7. TTB should require the disclosure of nutritive information and comparisons to a company's "regular" products in labeling and advertising that include specific nutritive claims (e.g., light, low-calorie, reduced-calorie, low-carbohydrate, reduced-carbohydrate).** Producers should provide information to avoid misleading consumers about the actual characteristics of the product or its difference from other products in the marketplace.

**8. If TTB explores the adoption of international labeling standards for alcoholic beverages sold in the U.S., all attempts must be made to ensure "upward global harmonization."** Labeling rules should meet international best practices, and should be adopted in a transparent process that involves all stakeholders, including consumer and health advocates.

**9. Alternatives to labeling are inadequate and would be ineffectual.** Forcing consumers to call a toll-free number or search the web to obtain information about alcoholic beverages would defeat the purpose of labeling and would continue to leave most alcohol consumers in the dark about important items, such as alcohol content, serving size, calories, etc.

Thank you for your attention to this critical issue. Detailed labeling of alcoholic beverages will enable the American public to make safe, healthy choices.

Sincerely,



Arthur T. Dean

Major General, U.S. Army, Retired  
Chairman and CEO